

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,)	
)	Case No. 1:17-cv-00640
Plaintiff,)	Hon. Joseph N. LaPlante
)	
v.)	
)	
ANNETTE B. DEMAURO,)	
)	
Defendant.)	
_____)	

ANNETTE B. DEMAURO'S TRIAL EXHIBIT LIST

Annette B. DeMauro identifies the following trial exhibits.

1. Letter 3709, dated June 30, 2014, From Department of the Treasury, Internal Revenue Service, to Annette DeMauro, with attachment, bates numbers IRS-APD-01-0034 through IRS-APD-01-0055 (Ex. 7 from depositions of DeMauro and Boumil).
2. Letter 3708, dated January 27, 2016, from Department of the Treasury, Internal Revenue Service, to Annette B. DeMauro, with returned envelope and certified mail receipt, bates numbers IRS-APD-01-0019 through IRS-APD-01-0023.
3. Copy of the passport of Annette DeMauro, issued August 25, 2000, produced by Defendant as a response to United States' request for production of documents number 10, bates numbers DRPD.10.1 to DRPD.10.15.
4. UBS Document, "Opening of an account/custody account," bates numbers IRS-APD-01-0264 through IRS-APD-01-0265 and IRS-APD-01-0263 (Ex. 1 from depositions of DeMauro and Boumil).
5. UBS account statements for 2001 to 2004, bates numbers PAQUINSUBPOENA-00001-1 to PAQUINSUBPOENA-00201.

6. UBS account statements for 2006, bates numbers PAQUINSUBPOENA-00625 to PAQUINSUBPOENA-00676.
7. UBS banker's notes (6-page document) (Ex. 9 from depositions of DeMauro and Boumil).
8. Unsigned "Client Copy" Form 1040, U.S. Individual Income Tax Return, tax year 2001, of Annette DeMauro, produced by Defendant as a response to United States' request for production of documents number 1, bates numbers DRPD 1.1 through DRPD 1.7 (Ex. 1 from deposition of Ouellet.)
9. Unsigned Form 1040, U.S. Individual Income Tax Return, tax year 2005, of Annette DeMauro, produced by Defendant as a response to United States' request for production of documents number 3, bates numbers DRPD 3.1 through DRPD 3.5. (Ex. 2 from depositions of DeMauro and Boumil; Ex. 2 from deposition of Ouellet.)
10. Unsigned Form 1040, U.S. Individual Income Tax Return, tax year 2011, of Annette B. DeMauro (Ex. 3 from deposition of Ouellet.)
11. Zürcher Kantonalbank, bank account signature card, Supplementary agreement to contracts re: cash and security accounts, and Establishment of Beneficiary Owner's Identity (4-page document) (Ex. 3 from depositions of DeMauro and Boumil).
12. Zürcher Kantonalbank Supplementary agreement to contracts re cash and security accounts (1-page document) (Ex. 5 from depositions of DeMauro and Boumil).
13. Zürcher Kantonalbank bank statement, dated December 1, 2007 (01.12.2007) bates number DRPD 6.20233 (Ex. 6 from depositions of DeMauro and Boumil).
14. Zürcher Kantonalbank account statements, bates numbers PAQUINSUBPOENA-00599 to PAQUINSUBPOENA-00624.

15. Letter, dated March 12, 2009, from S. James Boumil to Annette B. DeMauro, bates numbers 135-136.
16. Foreign account records for Oberbank and Zürcher Kantonalbank from IRS FBAR examination administrative file, bates numbers IRS-APD-01-0336 to IRS-APD-01-0366 0350).
17. E-mail from Siobhan Norris to Jaclyn O'Leary and Alexander Bove, dated June 13, 2011 regarding DeMauro's 2001-2005 tax returns, no bates number (7-page document). (Ex. 4 to deposition of Peter Goodwin.)
18. IRS Form 4564 Information Document Request signed by Revenue Agent Cheryl Russell, dated June 15, 2011, bates numbers IRS-APD-01-0544 to IRS-APD-0550.
19. IRS Revenue Agent's Initial Interview Questions and Notes by Revenue Agent Cheryl Russell, dated June 15, 2011, bates numbers IRS-APD-01-0614 through IRS-APD-01-0617. (Page IRS-APD-01-0614 is Ex. 10 from deposition of Peter Goodwin.)
20. Letter from Revenue Agent Cheryl Russell to Jaclyn O'Leary of Bove & Langa, dated August 11, 2011, bates numbers PAQUINSUBPOENA-01153 to PAQUINSUBPOENA-01160.
21. Letter from Jaclyn O'Leary of Bove & Langa to Annette DeMauro (with enclosures), dated September 23, 2011, transmitting Oberbank Statements for Oberbank Accounts 1598 and 1600, bates numbers 89 to 93.
22. Letter from Jaclyn O'Leary of Bove & Langa to Revenue Agent Cheryl Russell, dated October 21, 2011, bates numbers PAQUINSUBPOENA-01147 to PAQUINSUBPOENA-01109.

23. Letter from Jaclyn O'Leary of Bove & Langa to Revenue Agent Cheryl Russell, dated November 25, 2011, bates numbers PAQUINSUBPOENA-01108 to PAQUINSUBPOENA-01152
24. Oberbank account statements for 2009 and 2010, bates numbers PAQUINSUBPOENA-01221 to PAQUINSUBPOENA-01232.
25. Handwritten letter from Annette DeMauro to Alexander Bove and Jaclyn O'Leary, dated April 3, 2012, bates numbers 121 to 133.
26. Handwritten correspondence from Annette DeMauro to Bove and Langa, undated, with enclosures, including Oberbank Bank Information Statements, bates numbers 178 to 180.
27. Handwritten letter from Annette DeMauro to Jaclyn O'Leary, dated April 16, 2012, bates numbers 134 to 135.
28. Handwritten letter from Annette DeMauro to Jaclyn O'Leary, dated April 27, 2012, bates number 140.
29. Handwritten letter from Annette DeMauro to Alexander Bove, dated December 29, 2012, bates numbers 147 through 149.
30. Handwritten letter from Annette DeMauro to Alexander Bove and Edward Defranceschi, dated February 18, 2013.
31. Handwritten letter from Annette DeMauro to Alexander Bove, dated March 12, 2013, bates numbers 169 to 176.
32. IRS Revenue Agent's Workpaper 125-4: Meeting Notes by Revenue Agent Kevin Tracy, dated October 29, 2013, bates numbers IRS-APD-01-0618 through IRS-APD-01-0634.

33. One-page excerpt from IRS Revenue Agent's Workpaper 125-5: Interview Notes by Revenue Agent Kevin Tracy, dated January 14, 2014, bates number IRS-APD-01-0694. (Ex. 6 from deposition of Goodwin.)
34. One-page excerpt from IRS Administrative File, bates number IRS-APD-01-0420. (Ex. 7 from deposition of Goodwin.)
35. One-page excerpt from IRS Administrative File, dated March 11, 2014, bates number IRS-APD-01-0652. (Ex. 8 from deposition of Goodwin.)
36. One-page excerpt from IRS Administrative File, dated March 11, 2014, bates number IRS-APD-01-0655. (Ex. 9 from deposition of Goodwin.)
37. One-page excerpt from Fraudulent Failure to File Tax Return Penalty – 6651(f) Lead Sheet by Revenue Agent Kevin Tracy, dated April 29, 2014, bates number IRS-APD-01-420.
38. First page of Letter, dated August 5, 2014, from Law Office of Gerard J. Levins to Peter Goodwin, bates number IRS-APD-01-0302 (Ex. 8 from depositions of DeMauro and Boumil).
39. Letter, dated August 5, 2014, from Law Office of Gerald J. Levins to Peter Goodwin, (32-page letter), bates number IRS-APD-01-0302-1 through IRS-APD-01-0333-32 (full version of August 5, 2014 letter).
40. Divorce Decree, entered in divorce proceeding of *Annette B. DeMauro v. Joseph M. DeMauro*, State of New Hampshire, Superior Court, Rockingham, SS, dated February 4, 2000, Walter L. Murphy, Presiding Justice (Ex.10 from depositions of DeMauro and Boumil; Ex. 11 from deposition of Goodwin.).

41. Unsigned copies of Annette DeMauro's FBARs for 2005 to 2009, bates-numbered PAQUINSUBPOENA-01132.
42. Letter, dated February 16, 2012, from S. James Boumil to Alexander A. Bove, Jr., Re: Annette B. DeMauro, with attachments, bates numbers 180-186 (7-page document) (Exhibit 11 from depositions of DeMauro and Boumil).
43. Series of e-mails between S. James Boumil and Alexander Bove, various dates in 2012, bates numbers 19-46 (Ex. 12 at depositions of DeMauro and Boumil).
44. Letter from Jeffrey Paquin to Annette DeMauro (and enclosures), dated March 30, 2012, bates numbers PAQUINSUBPOENA-01110 to PAQUINSUBPOENA-01119.
45. Financial Statements dated May 5, 2012 and May 2, 2012, bates numbers PAQUINSUBPOENA-01212 to PAQUINSUBPOENA-01220.
46. Consent to Extend Time to Assess The Time To Assess Civil Penalties Provided by 31 U.S.C. § 5321 For FBAR Violations, for years 2007 and 2008, bates numbers IRS-APD-01-0029-1 through IRS-APD-0031-3.
47. Report Transmittal prepared by Kevin Tracy, dated April 28, 2014, regarding the FBAR penalty computation bates numbers IRS-APD-01-0182 through IRS-APD-01-0183.
48. IRS Account Transcript for Annette B. DeMauro, Form 1040 Liability, Tax Year 2001, no bates number. (Ex. 3 from Deposition of Goodwin.)
49. IRS Account Transcripts for Annette B. DeMauro, Form 1040 Liability, Tax Years 2002, 2003, and 2004, bates numbers DRPD 2.1 through DRPD 2.6 (Ex. 4 from deposition of Ouellet; Exhibit 5 from deposition of Goodwin.)
50. IRS Certificate of Official Record, dated March 2, 2017, authenticating Form 13448, Penalty Assessment Certification (Title 31 "FBAR") showing the FBAR penalty assessed

Annette DeMauro on December 1, 2015, for \$824,087.16, bates numbers IRS-APD-01-0006 through IRS-APD-01-0012.

51. IRS Form 4340 Certificate of Official Record of Assessments, Payments, and Other Specified Matters for Annette B. DeMauro's individual income tax for 2005.
52. IRS Form 4340 Certificate of Official Record of Assessments, Payments, and Other Specified Matters for Annette B. DeMauro's individual income tax for 2006.
53. IRS Form 4340 Certificate of Official Record of Assessments, Payments, and Other Specified Matters for Annette B. DeMauro's individual income tax for 2007.
54. IRS Form 4340 Certificate of Official Record of Assessments, Payments, and Other Specified Matters for Annette B. DeMauro's individual income tax for 2008.
55. Form 1040 U.S. Income Tax Return for Annette DeMauro for 2005.
56. Form 1040 U.S. Income Tax Return for Annette DeMauro for 2006.
57. Form 1040 U.S. Income Tax Return for Annette DeMauro for 2007
58. Form 1040 U.S. Income Tax Return for Annette DeMauro for 2008.
59. Form 1040 U.S. Income Tax Return for Annette DeMauro for 2009.
60. IRS Account Transcripts for Annette B. DeMauro, Form 1040A Liability, which shows the fraudulent failure to file penalties, for Tax Years 2005, 2006, 2007, and 2008.
61. Defendant's Responses to United States' First Set of Interrogatories to Defendant, signed May 23, 2019 by Annette B. DeMauro (16-page document) (Ex. 4 from depositions of DeMauro and Boumil), dated June 25, 2019.
62. IRS Declaration of Amount Due With Respect to FBAR Debt.
63. Transcript of the deposition testimony given by Annette B. DeMauro,
64. Transcript of the deposition testimony given by S. James Boumil.

65. Transcript of the deposition testimony given by Ronald Oullet.
66. Transcript of the deposition testimony given by Jeffrey Paquin.
67. Memorandum dated June 8, 2018 from Gerard J. Levins to Thomas P. Cole Re: Evidence Supporting Counterclaim Under 26 U.S.C. 6511 for Tax Years 2005, 2006, 2007 and 2008 and Fed. R. Civ. P. 13.
68. Certified Mail Receipt stamped by USPS on 12/21/2017 and received by the Internal Revenue Service (the "IRS") on 12/26/2017;
69. Memorandum from Gerard J. Levins to the IRS dated 12/15/2017 with respect to the Claims for Refund and Request for Abatement (Forms 843) for the tax years ended 12/31/2005, 12/31/2006, 12/31/2007, and 12/31/2008;
70. Form 843, Claim for Refund and Request for Abatement, for the tax year ended 12/31/2005;
71. Form 843, Claim for Refund and Request for Abatement, for the tax year ended 12/31/2006;
72. Form 843, Claim for Refund and Request for Abatement, for the tax year ended 12/31/2007;
73. Form 843, Claim for Refund and Request for Abatement, for the tax year ended 12/31/2008;
74. IRS correspondence dated 02/15/2018;
75. IRS Account Transcript for 12/31/2005 reflecting payment of \$5,570.86 on 2/6/2016;
76. IRS Account Transcript for 12/31/2006 reflecting payment of \$14,902.38 on 9/20/2017;

77. IRS Account Transcript for 12/31/2007 reflecting payment of \$16,056.14 on 9/20/2017,
78. and IRS Account Transcript for 12/31/2008 reflecting payment of \$115,146.37 on 9/20/2017.

ANNETTE B. DEMAURO

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